



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

December 18, 2020

BY ECF

Hon. Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl St.
New York, New York 10007

12/22/20
So Ordered

Re: United States v. Stolarz, 11 Crim. 230 (CM)

Dear Chief Judge McMahon:

The parties write jointly to request a stay of the Court's order releasing defendant John Stolarz.

On or about December 8, the Court granted the defendant's motion for compassionate release, and stayed his release date for 14 days, "for the verification of the defendant's residence and/or establishment of a release plan, to make appropriate travel arrangements, and to ensure the defendant's safe release." Dkt. 35.

The defendant intends to reside at Roseville Manor, an assisted living facility in New Jersey, after his release. Roseville Manor has accepted the defendant, but cannot physically allow him entry into the facility until the defendant's New Jersey Medicaid is in place. The parties are working to facilitate the Medicaid activation, but understand the process may not be finished by the Court's December 22 deadline. The parties accordingly jointly request that the Court modify

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its release order so that the defendant be released as soon as Medicaid is activated and transportation is arranged, rather than by December 22.

The parties further note that the defendant is no longer hospitalized, and has returned to Allenwood Medium FCI.

Respectfully Submitted,

AUDREY STRAUSS
Acting United States Attorney

by: /s/ Kevin Mead
Kevin Mead
Assistant United States Attorney
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CC: Annalisa Mirón, counsel for defendant John Stolarz (by ECF)